

Andrew L. Schlafly (AS4533)  
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*Attorney for Plaintiff Association of  
American Physicians & Surgeons, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

<b>ASSOCIATION OF AMERICAN</b>	)	
<b>PHYSICIANS &amp; SURGEONS, INC.,</b>	)	
	)	<b>Civil Action</b>
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>No. 3:13-cv-2609-PGS-LHG</b>
	)	
<b>AMERICAN BOARD OF MEDICAL</b>	)	<b>Return Date: Aug. 5, 2013</b>
<b>SPECIALTIES,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

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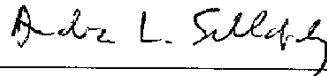
**DECLARATION OF ANDREW L. SCHLAFLY IN SUPPORT OF BRIEF OF  
PLAINTIFF ASSOCIATION OF AMERICAN PHYSICIANS & SURGEONS,  
INC., IN RESPONSE TO DEFENDANT'S MOTION TO DISMISS OR  
TRANSFER VENUE**

ANDREW L. SCHLAFLY, of full age, declares as follows:

1. I am counsel for Plaintiff Association of American Physicians & Surgeons, Inc., in the foregoing matter.
2. A true and correct copy of the relevant excerpts from the IRS Form 990 of Defendant American Board of Medical Specialties, for year 2011, is attached as Exhibit A. This discloses the payment of \$648,006 by Defendant to the New Jersey-based firm of Sills, Cummis & Gross P.C.

3. A true and correct copy of a website page posted by the New Jersey-based firm of Sills, Cummis & Gross P.C. (part of <http://www.sillscummis.com>), which describes its "Representative Matters" in the category of "Health Care Corporate and Transactional," as of July 22, 2013, is attached as Exhibit B. Included at the end of its list of Representative Matters is "Reviewing and revising Medical Staff bylaws to achieve operational objectives and *to comply with updated Joint Commission standards.*" (emphasis added)

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 22, 2013.



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Andrew L. Schlafly